Ontario
Human Rights
Commission

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DINING OUT ACCESSIBLY

An Accessibility Audit of Select Restaurant Chains in Ontario

Undertaken for the Ontario Human Rights Commission

REVIEW OF RESULTS AND COMMITMENTS

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Objectives and Overview

It has been more than twenty years since protection from discrimination on the ground of disability was introduced into the Ontario *Human Rights Code*. And, despite minimum accessibility standards set out in the *Building Code*, as well as decades of promoting public awareness, persons with disabilities in Ontario continue to face a multitude of physical, attitudinal and service-related barriers in all social areas of our society. This is no less true when it comes to the restaurant and hospitality industry.

Restaurants provide a popular means for Ontarians to participate in the life of their communities. They are more than just a convenience; they are also a venue for social interaction. Many Ontarians take for granted that they can dine out at a favourite local restaurant, bar or café of their choice. But, for persons with disabilities, accessing restaurants can mean confronting barriers that can either prevent access altogether or make the experience a difficult and undignified one.

The Ontario Human Rights Commission (the "Commission") routinely receives inquiries and complaints from persons with disabilities pertaining to inaccessible premises and services. Similar concerns have been identified during Commission public consultations, at its education activities, through its research, and were highlighted in its 2002 submission on the *Building Code* to the Ministry of Municipal Affairs and Housing (see Appendix I for an overview).

Section 29 of the Ontario *Human Rights Code* gives the Commission the power and discretion to inquire into and advise on human rights issues and encourage action to address barriers and differential treatment to help prevent such matters from becoming the subject of a formal complaint of discrimination to the Commission.

In the spring of 2001, the Commission began its efforts to engage the restaurant industry to promote the accessibility of its services and facilities for persons with disabilities in Ontario.

The objectives of the Commission's inquiry into restaurant accessibility are two-fold:

- To increase awareness and report back to restaurant industry leaders and the general public on the nature of existing barriers that prevent persons with disabilities from accessing restaurants in their community.
- To work cooperatively with restaurant industry leaders and seek their commitment to voluntarily take steps to identify, remove and prevent barriers and accommodate the needs of customers with disabilities in order to meet their obligations under Ontario's *Human Rights Code*.

This document, *Dining Out Accessibly: A Review of Audit Results and Commitments* ("*Dining Out Accessibly*"), has been prepared by the Commission subsequent to initiating an external audit of seven restaurant chains in Ontario. The audit was conducted on behalf of the Commission by Betty Dion Enterprises Limited.

In alphabetical order and by their brand name the chains that were selected are: Country Style Donuts, McDonalds, Pizza Hut, Starbucks, Subway, Swiss Chalet and Tim Hortons.

The considerations in selecting the restaurant sites to audit included those: that have a large number of locations in a variety of large and small population centres across the province; that offered different fare; that were not owned by the same parent company; and that have some stand-alone locations. Sites were selected from a mix of downtown areas as well as restaurants outside a downtown core and efforts were made to select a mix of older and newer restaurants.

The results of the audit are set out in Appendix II of this Report. Four sites were audited per chain for the purpose of demonstrating the type of barriers customers with disabilities face in accessing restaurants and the need to plan and take steps to remove and prevent barriers. These results should not be used to rank the chains nor draw conclusions about the degree of accessibility across an entire restaurant chain.

Rather, the Commission is looking to the restaurant chains' response to the results of the accessibility audit as the key indicator of their commitment to address accessibility issues for customers with disabilities.

The selection of these seven chains is not meant to infer that other chains are exemplary and not open to scrutiny. The Commission will continue to carry out its enforcement and promotion functions in this regard and will have the same expectations for the entire restaurant and hospitality industry.

The *Code* also provides the Commission with the option to initiate a formal complaint against facilities that do not take steps to comply with the *Code*. It is the Commission's hope, however, that this initiative will help to achieve the aims and objectives of the *Code* through cooperation, rather than the use of formal enforcement functions.

Duty to Accommodate Disability

Under the Ontario *Human Rights Code*, persons with disabilities have the right to equal treatment in accessing services such as those provided by restaurants, shops, hotels, movie theatres and other public places. Businesses have an obligation to make their facilities accessible. A failure to provide persons with disabilities equal access to a facility or equal treatment in a service would constitute discrimination under the *Code* and can be the subject of a human rights complaint to the Commission.

A restaurant would have to demonstrate as a defence to such discrimination that providing access or accommodating services would amount to undue hardship with regard to cost, outside sources of funding, or health and safety factors.

Moreover, the Canadian *Charter of Rights and Freedoms*, as well as the different levels of government and the courts, have all recognized the right of persons with disabilities to accessibility. The Supreme Court of Canada in particular has noted the need to 'fine-tune' society so that its structures and assumptions do not exclude persons with disabilities from participating in society[1] and has affirmed that standards should be designed to reflect all members of society, insofar as this is reasonably possible.[2]

The Commission's *Policy and Guidelines on Disability and the Duty to Accommodate* (the "*Disability Policy*") is central to this initiative as it sets out the relevant provisions of the *Code*, applicable case law, the legal tests for accommodation, undue hardship *etc.* and makes clear that services and facilities such as restaurants should be accessible by making choices for inclusive design from the outset.

Where barriers already exist, steps should be taken to remove them. A business might sometimes be able to demonstrate objectively that immediate implementation of the most appropriate solution would result in undue hardship. In such cases, businesses still have a duty to consider and implement interim or next-best measures that would not result in undue hardship. Such measures should be in place only until such time that more ideal solutions could be attained or phased in, if possible.

In addition to responding to the needs of customers or employees with disabilities, barrier removal is also valuable to others such as older persons and families with young children who can benefit from increased accessibility.

It should be noted that the *Human Rights Code* has primacy over all other legislation in Ontario, unless the other legislation states that it prevails over the *Code*. The Ontario *Building Code Act* contains no such provision. Reliance solely on relevant building codes has been clearly rejected as a defence to a complaint of discrimination under the *Human Rights Code*.[3]

Consequently, businesses, architects, designers and builders that choose to comply only with the requirements of the *Building Code*, and fail to consider and adhere to the legal obligations they also have under the *Human Rights Code*, are leaving themselves vulnerable to the possibility of a human rights complaint.

Events Leading to the Audit

In recent years, the proportion of complaints citing the ground of disability has been reaching 50% or more of the Commission's annual caseload. Although a large majority

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[1] *Eaton v. Brant County Board of Education*, [1997] 1 S.C.R. 241 at para. 67.
[2] *British Columbia (Public Service Employee Relations Commission) v. BCGSEU*, [1999] 3 S.C.R. 3 at para. 68.
[3] In *Quesnel v. London Educational Health Centre* (1995), 28 C.H.R.R. D/474, an Ontario Human Rights Tribunal stated that compliance with building codes does not, in itself, justify a breach of human rights legislation.

of complaints are in the area of employment, the Commission regularly receives inquiries and takes in complaints from persons with disabilities alleging that restaurant facilities and services are inaccessible.

In 1999, the Commission began a public consultation on disability issues which led to the release in March 2001 of its substantially revised *Policy and Guidelines on Disability and the Duty to Accommodate*. In 2000, the Commission also undertook a public consultation on the rights of older persons in Ontario. During both consultations, the Commission heard that persons with disabilities of all ages and older persons often face barriers in accessing facilities and services such as restaurants.

In June 2001, the Commission released its consultation report *Time for Action: Advancing Human Rights for Older Ontarians*. One of the recommendations of this report called on the provincial government to amend the *Building Code* to incorporate the best principles of barrier-free design.

The Commission subsequently released its *Policy on Discrimination Against Older Persons Because of Age* (the "*Age Policy*") in June 2002. Similar to the Commission's *Disability Policy*, the *Age Policy* states that those who are responsible for the provision of services to the public must take positive steps to ensure disadvantaged persons benefit equally from those services. This means providing services in a manner that is inclusive and accessible from the start and also providing accommodation, subject to the undue hardship standard.

At the launch of the *Disability Policy* in March 2001, the Commission indicated it would be engaging in ongoing efforts to promote accessibility of services and facilities in Ontario. The Commission announced that it would be approaching businesses to assess the accessibility of services and facilities for persons with disabilities.

Accordingly, in May 2001 the Commission began its inquiry into restaurant accessibility pursuant to its mandate under section 29 of the *Code*. The Commission sent letters to 29 major restaurant chains in Ontario to ask about the degree of accessibility of their premises, what standards are used, and what objectives are set for achieving accessibility in the future. Despite a follow-up letter in September 2001, many of the chains failed to respond.

It became clear when the Commission reviewed the responses received that restaurant chains were setting their standards for accessibility based only on the Ontario *Building Code* that was in effect at the time of construction or renovation. It was learned that, for the most part, neither the *Human Rights Code*, nor the Commission's *Disability Policy*, nor other available barrier-free design standards were being considered in setting standards for accessibility in restaurants. This has also been the Commission's own observation based on inquiries received and complaints filed regarding this issue.

As well, the Commission presented an in-depth submission to the Ministry of Municipal Affairs and Housing in March 2002 outlining the need for reform to the barrier-free

access requirements in the Ontario *Building Code*. The submission describes priorities for change as well as the human rights principles that should be reflected in a revised *Building Code* (see Appendix I).

Continuing with its efforts, the Commission engaged an expert consultant on disability issues and barrier-free design to conduct an accessibility audit in August 2002. The audit focused on the physical premises and services of seven select restaurant chains totaling 28 locations across the province.

Audit Methodology

Seven of the 29 high-profile restaurant chains that were previously surveyed in 2001 through correspondence from the Commission were selected. These chains are: Country Style Donuts, McDonalds, Pizza Hut, Starbucks, Subway, Swiss Chalet and Tim Hortons.

It was premised that an audit of four sites per chain, for a total of 28 sites across seven chains, would provide an indication of the nature of existing barriers that prevent persons with disabilities from accessing restaurants in their community.

Completely inaccessible locations were avoided so that the auditors who use wheelchairs could access the premises to complete the balance of the accessibility audit.

A checklist was developed to identify critical accessibility indicators for different disabilities that would provide a quick, reliable and accurate assessment of restaurant facilities based on criteria from CSA Standard B651-M95 "Barrier Free Design" and with the Ontario *Building Code* (see Appendix III). It was applied only to the public areas of the restaurants audited and did not include areas used only by employees. Persons with disabilities conducted the assessment of sites.

The results of the accessibility audit of each of the 28 locations, set out in Appendix II, provide a review of the accessibility features and barriers that would impact the ability of customers with disabilities to access the facilities and services.

These results were shared with the seven respective chains in June 2003 to ascertain their plans and seek their commitments for achieving and ensuring accessibility in the future.

Summary of Results

At a number of the sites visited, the results of the audit confirmed that there are restaurant facilities in operation in Ontario that do not meet even the most basic accessibility requirements of the current *Building Code*, nor the provisions of the Ontario

Human Rights Code. In some cases, facilities are completely inaccessible while at other locations, persons with disabilities would face significant barriers, particularly in accessing washrooms.

A range of barriers were identified, summarized as follows:

1. Pedestrian route (exterior to interior)

   There was a lack of an obvious and safe pedestrian route into the facility at many locations. While this can be an issue for many, it creates a particularly difficult situation for individuals with visual impairments who do not drive.

2. Parking

   Accessible parking spaces were sometimes poorly placed, too narrow or too sloped. Some lacked a vertical sign, which is especially important in areas where snowfall is heavy in winter.

3. Entrance doors

   Entrance doors did not always meet clear width requirements of the *Building Code*, did not open fully, did not have automatic door openers, or had two doors in close sequence making it difficult for persons using mobility aids to hold open one door while opening another. Some entrance ramps were not appropriately constructed, *e.g.* having a ramp but no level landing at the top. Some entrances had thresholds over 13 mm high, which not only makes it difficult for individuals who use wheelchairs but also imposes a tripping hazard for persons with other disabilities. Some entrances were completely inaccessible because of several steps leading up to the entrance door.

4. Signage

   There was a lack of well-contrasted signage, menu boards and menus – these are an issue for persons with visual impairments. Ideally, signage should be well contrasted with a Sans Serif font, such as Arial or Helvetica. Overhead menus should also be available at eye level or in paper format to allow persons with visual impairments to get close enough to read them. Accessible tactile signage, including Braille signage on bathroom doors and Braille menus are equally important.

   And, not all cash registers displayed the price, which is particularly useful for persons who are deaf or hard-of-hearing.

5. Interior Route

   Although a number of restaurants were designed with adequate clear routes and maneuvering space for wheelchairs, access was compromised by placement of display materials, podiums, plants, and garbage bins. Such barriers show a lack of consideration for persons with disabilities but can be easily corrected. As well, some restaurants lacked a variety of seating options which presents a problem for persons with mobility aids or guide dogs.

6. Washrooms

   The results for washrooms were particularly disappointing. In some restaurants, the washrooms were located in an inaccessible part of the restaurant (as too were the pay phones in some cases). Some restaurants only provided either the men's or women's (usually the women's) washroom as accessible. Some washroom entrance doors did not meet the clear width requirements in the *Building Code*. Some stalls had narrow doorways or were too small. Some lacked grab bars, or they were installed incorrectly. The accessible stall door sometimes incorrectly opened inwards instead of outwards rendering it ineffective. And there was often a lack of appropriate maneuvering space due to, for example, placement of garbage bins, toilet paper dispensers *etc.* In other cases, the accessible stall was completely out of order.

   There were also some washrooms where the location of the sink or hand dryer requires the customer to stand in front of the door. This is especially troublesome for customers who use wheelchairs because it completely prevents them or others from entering or leaving the washroom while the sink or dryer are being used.

7. Other Accessibility Barriers

   Some restaurants required people to make food choices, *e.g.* from a salad bar or display cabinet, but at a height that may not be visible for those who use a wheelchair.

   Self-serve beverage and condiments were sometimes beyond the reach of customers who use wheelchairs. It would also be difficult for persons with visual impairments to use these areas independently as nothing is labeled.

   Take-out counters were also sometimes too high.

   Music levels where sometimes too high (also an issue for persons with hearing loss) and the quality and quantity of lighting was sometimes either too harsh or inadequate (an issue for persons with vision loss).

In many situations, there was a lack of consistency in accessibility design and practices between outlets of the same restaurant chain.

Despite barriers being identified at most restaurant locations, it must be said that some of the sites visited, typically newer ones, were exemplary in their degree of barrier-free access. At the same time, there were a few newer sites that still had problems with accessibility. One location, newly opened within the last few years, could not be accessed due to several steps leading to the entrance. A ramp was not provided.

Expectations and Commitments

Providers of restaurant services must comply with the requirements of both the *Building Code* and the *Human Rights Code*. Those who do not may pay a high price in terms of loss of a significant client base and damaged reputations.

Accessibility also makes good business sense, particularly in light of our aging population and the greater numbers of Ontarians exhibiting varying degrees of ability, as well as families with small children. All of these groups can benefit from accessibility features such as ramps, automatic doors and unobstructed passageways.

The Commission does recognize the difficulty that businesses sometimes face in achieving accessibility, particularly those that own or operate older facilities. Renovations may seem too costly or not worth pursuing if a location is not very profitable or if there are plans to relocate in the future. Businesses that complied with older building codes that did not require barrier-free design can be understandably frustrated to learn the *Human Rights Code* can still require them to take steps and achieve accessibility in these premises, subject only to the undue hardship standard.

At the same time, a business or organization that has no plan or intention to renovate inaccessible facilities is leaving itself vulnerable to the possibility of a complaint under the *Human Rights Code*. Rather than addressing barriers simply on the basis of one human rights complaint at a time, the Commission would much prefer that businesses make commitments to achieve an inclusive and accessible restaurant and hospitality industry voluntarily and cooperatively.

Planning and taking steps are key components to achieving full accessibility and preventing human rights complaints. This must involve a commitment to refrain from creating new barriers for persons with disabilities and to identify and remove existing ones.

To this end, the Commission initiated the Accessibility Audit of select chains to demonstrate the nature of barriers that exist in the restaurant industry. Detailed results of the Accessibility Audit were shared with each of the seven restaurant chains in June 2003. The Commission then sought meetings with senior representatives of the chains in the Fall of 2003 to hear their reaction to the results of the Audit. The chains were asked to commit to the following five steps identified together by the Commission as critical for the restaurant industry to undertake towards meeting its obligations under Ontario's *Human Rights Code*:

1. **Develop an accessibility policy and customer complaints procedure.** Create no new barriers to access. Accommodate needs where barriers exist, short of undue hardship.
2. **Review and identify accessibility barriers** across corporate-owned and franchisee facilities.

3. **Develop a standardized accessibility plan for future locations** that is based not just on the current Ontario *Building Code*, but also in respect of the requirements for accessibility under the Ontario *Human Rights Code* and the Commission's *Policy and Guidelines on Disability and the Duty to Accommodate*, as well as upon current standards and best practices in barrier-free design.[4] This standardized plan should be mandated for all new locations and part of all franchisee agreements, and should clearly stipulate that the requirements of the accessibility plan must be met as a condition of the agreement. Avoid opening new restaurants in inaccessible premises.
4. **For existing facilities, develop a plan, and remove barriers** to achieve accessibility. Immediately take steps to fix problems that can be easily addressed and/or are relatively inexpensive. For more complex barriers, implement interim solutions and phase in remaining changes that are needed to achieve full accessibility. Prioritize the changes, set specific deadlines, and assign responsibilities.
5. **Monitor progress** toward achieving accessibility **and report back** to the Commission in one year's time on achievements.

On the whole, the Commission is pleased with the positive and enthusiastic response received from the chains. All seven chains have committed, for the most part, to the five (see Appendix IV for a complete list of commitments made).

Some of the chains also reported on additional related activities or expressed broader views (also see Appendix IV).

The Commission would like to recognize and commend these chains for making important commitments and undertaking activities to address accessibility barriers for customers with disabilities.

Appendix V of this Report lists a number of resources available to businesses and organizations to assist with the barrier-free design of their facilities and services. The accessibility checklist used in the Commission's audit of select restaurant locations is also included in Appendix III.

For its part, the Commission is committed to the following actions:

1. The Commission will continue a multi-faceted and systemic approach to pursuing the issue of restaurant accessibility by engaging the restaurant industry through professional associations, as well as raising concerns with government in regards to the *Building Code* and the Government's initiative to review the scope of the *Ontarians with Disabilities Act*.

[4] CSA Standard B651-M95 "Barrier Free Design" and CSA Standard B480-02 "Customer Service for People with Disabilities" (www.csa.ca)

2. The Commission will continue to receive, mediate and investigate complaints involving inaccessible restaurants and other services, and where appropriate, will refer unresolved cases to a Human Rights Tribunal.
3. The Commission will report back in 2005 on the status of activities and advancements made in all these areas.
4. The Commission will disseminate these findings to other major restaurant chains and will also ask them to report back on the accessibility of their chains as well as seek their commitment to the five steps listed above.

APPENDIX I: Building Code Issues

The *Submission of the Ontario Human Rights Commission Concerning Barrier-Free Access Requirements in the Ontario Building Code*[5] was made in March 2002 to the Ministry of Municipal Affairs and Housing in regard to that Ministry's review of the provisions of the *Building Code Act*: The following is a summary of concerns raised by the Commission:

- The Commission was very concerned to learn that the standards for barrier-free design that are already contained in the *Building Code Act* are often not met by builders or enforced by inspectors.
- Technical compliance with these standards does not necessarily result in substantive equality, *i.e.* usability, dignity, ease, timeliness, convenience.
- If a building is made accessible because of renovations to entrances, under the *Building Code* other systems do not have to be renovated. The 'system' method of retrofitting a building appears illogical insofar as it requires a building to make the entrance accessible but not the doors, washrooms, *etc.*
- Elevators are not required under the *Building Code*; no elevator access to a floor also means no barrier free path requirements.
- Tactile signage is not required.
- Signage and directional indicators for exits, elevators, *etc.* located at eye level would be helpful for persons with memory disabilities, those with low vision and even the public in general.
- At present, fast food restaurants in Ontario can construct service counters at a height that poses a barrier to persons using a wheelchair. By way of contrast, the American Uniform Federal Accessibility Standards (see Appendix II) prescribe more detailed and specific requirements for cafeterias and restaurants such as the amount of accessible seating and how it should be distributed, height of food service areas, *etc.*
- Alarm systems do not appear to require visual signals.
- Where renovations are undertaken, though it may not be necessary to address accessibility under the *Building Code*, there still may be an obligation to do so under the *Human Rights Code*.
- Standards under the *Building Code* need to be more comprehensive.
- Persons with disabilities should have a similar choice as other individuals.
- Stronger provisions regarding upkeep and renovation of facilities are required.
- Those responsible for advising on or abiding by the *Building Code* do not receive sufficient training and evaluation

[5] The full Submission is available on the Commission's web site at www.ohrc.on.ca/english/publications/building-code-submission.shtml.

APPENDIX II: Results by Audit Site

ACCESSIBILITY AUDIT OF SELECT RESTAURANT CHAINS IN ONTARIO

Prepared by Betty Dion Enterprises Ltd

CHAIN-A

Chain-A: Audit site-1

This restaurant has been in business for many years. There is no safe pedestrian route provided to access the restaurant from the street. There is designated parking for use by people with disabilities, with a vertical sign indicating the spot. It is quite difficult to access the spot, though, as you either have to drive against the flow of traffic exiting the drive-thru, or drive around the restaurant along side the drive-thru and then back into the accessible spot. The curb ramp leading from the parking area is uneven and has a truncated domed manhole cover in the middle of the path.

The doors at the accessible entrance should have adequate clear width, however, the first door does not open fully, making it difficult for all users. Unfortunately, there are no automatic door openers provided. There are two doors in sequence which are very close together and a customer, particularly a customer who uses a wheelchair or walker, cannot pass through one door, without holding open the other at the same time.

The interior offers both take-out and seating areas. The seating area is equipped with a mix of seating and tables with chairs that are moveable. The sit-down seating area is well illuminated and equipped with different types of lighting.

The interior at the take-out counter is well illuminated and has a low counter. Signage is provided overhead, and the menu is displayed as a black background with either yellow, blue or red writing, making it difficult to read due to poor colour contrast. There is a sign board in front of the counter with the newest menu choices, which is well contrasted, and is, therefore, accessible to customers with visual impairments. However, it is only a small portion of the full menu.

The condiment, coffee and cream dispensers are self serve. There is a counter at a height of 1000 mm, which is intended for trays. The condiment dispensers are on top of another counter at an approximate height of 1200 mm, and within reach of 300 mm. The operable parts are all 1400 mm and higher which is above the reach of people who use wheelchairs. It is impossible for someone seated to see into the basins holding some of the condiments. There is no signage at the self-serve centre, accessible or otherwise. There was a staff member available who, upon request, did provide assistance.

The amount displayed on the cash register was easy to read. No telephone is available for public use.

The door to the washroom has adequate manoeuvring space. A dedicated accessible washroom is provided. The door has a wheelchair logo but no tactile or Braille signage. The room is fairly spacious and can accommodate a wheelchair. The sink is equipped with lever handles and the sink basin is rather low and the pipes are not insulated.

This site is quite difficult for customers with disabilities. The main entrance doors are difficult to operate, the signage is not well displayed and many services are beyond the reach of many customers with disabilities.

Chain-A: Audit site-2

The landscape of this newer location, unfortunately, is entirely designed to accommodate vehicles, not people, as there is no sidewalk or safe pedestrian route outside of the route of travel.

There is a telephone outside for public use that has volume control and is mounted low but it is located on a landing at the bottom of the stairs, which is inaccessible, as there is no curb ramp on the landing.

The entrance doors are wide enough, however, there is a ramp that is too narrow which leads to entrance doors, as a result, there is very limited manoeuvring space. The counter is low, which is good and the menu is displayed overhead in a variety of colours, which makes it difficult to read, due to the poor contrast of the characters. There are both fixed and moveable chairs and one table is higher than others to accommodate wheelchair users, which provides a good choice of options.

The washrooms are marked as accessible, although there are many deficiencies in the washrooms. The entrance doors are less than the required 810 mm, and the doors lack the required manoeuvring space beside the doors. Immediately inside the door in the washroom, a sink is located that has adequate knee space and lever handles, although if a person in a wheelchair is positioned at the sink, they would block everyone from moving in or out of the washroom. Also in that route, hand dryers are placed making them a protrusion hazard that people, particularly people with visual impairments might bump into. (Protrusions are permitted to extend a maximum of 100 mm into the pedestrian route.) The door leading into the washrooms has a clear width of only 760 mm. The stall door is wide; unfortunately it opens into the stall, where it is supposed to open out. There is only one grab bar on the sidewall beside the toilet, where another one is also required behind the toilet. The manoeuvring space beside the toilet, which is supposed to remain clear, is occupied by a garbage receptacle. Unfortunately, the accessible toilet stall was also out of order.

This facility is not accessible to customers with disabilities. It has many inadequate architectural features, including the lack of pedestrian access into the facility,

inaccessible washroom facilities, poor signage and the lack of forethought with the placement of the telephone.

Chain-A: Audit site-3

This is a newer location. The chain's logo is clearly displayed but the street address is not. There is a sidewalk leading from the street and an accessible parking space provided. The entrance doors have adequate clear width and both doors are equipped with automatic door openers.

The counter is low and the menu is displayed behind the counter, although the characters and numbers are displayed in a variety of colours, some of which do not have adequate contrast to allow them to be easily read. The price on the cash register is displayed for the customer, which is convenient for everyone, but is especially appreciated by people who are deaf or hard of hearing. No Braille menus are available. The chairs are moveable which is convenient for wheelchair users and their friends.

The washroom doors do not have tactile or Braille signage. There is an accessible stall with adequate manoeuvring space beside the toilet and appropriate grab bars.

A telephone equipped with volume control is available for public use.

This restaurant has many accessible features with good door and washroom design although it is not accessible to people with visual impairments as the menu is displayed against many different colours, making it difficult to read. The signage on the washroom doors lack tactile and Braille characters, but the existence of sidewalks, automatic door openers and accessible telephones are all positive features.

Chain-A: Audit site-4

This new site is located in the parking lot of a large mall. It is accessed from the street via a set of stairs, which lead one to cross the drive-thru to a side door. The drive-thru is marked with a crosswalk. Handrails are provided on the stairs but they lack horizontal extensions, which are required. Accessible parking is provided beside the entrance although these spaces are not large.

The entrance doors are wide and equipped with automatic door openers. The floor is extremely slippery when wet. The interior is very well illuminated and the counter is low. The menu is displayed in blue, yellow and red on a black background, making it difficult to read for persons with visual disabilities due to poor contrast and colour selection. The amount to be paid is displayed at the cash register. The interior is spacious and without protrusions, but highchairs for children are sometimes left in the aisles. A radio played quite loudly during the assessment.

At this location, an audible fire alarm is provided, but not one with a visual alarm. A variety of seating is available. Booths and tables are at a variety of heights.

Unfortunately, the seat at one of the booths is not properly secured and moved when one sat down. This can be disconcerting to everyone, but can be dangerous for someone with an agility or balance limitation.

A well-contrasted wheelchair logo and washroom sign is displayed over the door to the washrooms. However, no tactile characters or Braille is provided to assist a blind person to identify the appropriate washroom. An accessible washroom is provided with appropriate manoeuvring space, grab bars, coat hook and space beside the toilet.

A baby change table is provided in the accessible stall and instructions are provided in Braille, which is very good. The sink and mirror are fine but the waste dispenser, which is moveable, is located in front of the accessible stall door in the men's washroom. Unfortunately, the hand dryers protrude into the pedestrian route along the route to the stalls.

On a positive note, the door into the play area is accessible. The climbing play apparatus is not designed to be "accessible", but some Nintendo stations are available with controls at a variety of heights, which is good. Other play elements could be provided for children unable to use the climbing element. No telephone is available for public use.

CHAIN-B

Chain-B – Audit site-1

There is no sidewalk leading to the entrance of this chain's location as the landscape has been designed to accommodate cars. A curb ramp and a designated parking stall are provided but no vertical sign is positioned at the space, which is recommended in order to clearly identify the parking stall, particularly in snowy conditions.

The entrance door has adequate width but is not equipped with an automatic door opener.

The counter is low and the food choices are well displayed. The price is displayed on the cash register which is convenient for all customers especially those with hearing disabilities. The menu is displayed overhead with yellow text on a red background, with some pictures and is backlit. No Braille menu or menus at eye level are available. Tables are available at an appropriate height to accommodate a wheelchair and chairs are moveable, which is convenient for all customers.

The washrooms are accessible and have adequate manoeuvring spaces and grab bars installed. The faucet on the sink does not appear to be accessible and appeared to be broken during the assessment.

A telephone is available for customer use and it is equipped with a flux coil that allows it to be accessible to customers who use hearing aids. A non-smoking area is provided.

Chain-B: Audit site-2

This site is located along a main city street. The signage is clear but there is no sidewalk from the street, which makes it extremely difficult for customers who do not drive. A curb ramp is provided and the ramp is fine. The entrance door has adequate clear width but no automatic door opener is provided. No designated parking for customers with disabilities is provided, which is unusual.

The interior was extremely smoky when visited. The counter is low and tables with moveable chairs are not available. Signage is overhead but has well contrasted characters.

Accessible signage is not provided at the washroom doors and the doors lack the required manoeuvring space. An accessible stall is provided but it lacks manoeuvring space beside the door. Manoeuvring space and grab bars are both provided in the stall. Unfortunately, storage materials blocked the transfer space. The interior of the restaurant was extremely smoky, a difficult environment for many people, including those with asthma, emphysema or environmental sensitivities.

Chain-B: Audit site-3

This site is located at a busy suburban intersection. The building was built within the last 10 years. The signage for the restaurant is clearly displayed, however there is no street number displayed. There is no sidewalk leading from the street, which is dangerous for those customers who do not approach the restaurant in a vehicle. There is one dedicated accessible parking stall, which is level and has a vertical sign. A curb ramp is provided from the parking lot to the sidewalk. The entrance doors have adequate clear width but no automatic door openers.

The interior has both a smoking and non-smoking section. The smoking section is a completely enclosed unit with separate ventilation. Access to the section is through a door which has sufficient clear width. However, there is limited manoeuvring space once inside the smoking area.

The counter is low and many of the food selections are clearly visible, although the items for sandwiches and wraps cannot be seen from a seated perspective. In the non-smoking area, only tables and chairs, which are moveable, are available as seating options. In the smoking section, only non-moveable benches are available as a seating option, which presents a problem for all customers, but especially those who are wheelchair users. The menu is displayed overhead and is mostly well contrasted, although the back lighting of the signage is inconsistent in some areas. The menu for sandwiches and wraps is in smaller print and the contrast is not as good. The

restaurant is well illuminated. Immediately outside the restaurant there is a phone available for public use that is equipped with volume control.

There is a door leading to a vestibule, off of which are the men's and women's washrooms. The wall adjacent to the vestibule door is on a slight angle, therefore decreasing the required manoeuvring space of 600 mm on the pull side of the door. The narrowness of the hall precludes the lack of the 300 mm required on the push side when leaving the washroom vestibule. Braille and tactile signage are not provided on the washroom doors and the doors are quite heavy and lack levered handles.

The manoeuvring space in the washroom is large enough to accommodate someone using a wheelchair, however, the garbage can is located in the transfer space beside the toilet, an area that must be kept clear to accommodate the wheelchair. The sink has levered faucets, and the pipes are recessed. The sink encroaches on the area required on the pull side of the door to allow a person using a wheelchair to position the wheelchair beside the door. The lock on the door is difficult to open as it requires two concurrent motions (push and twist).

Chain-B: Audit site-4

This site is located in a strip-mall plaza on the commercial street beside a residential neighbourhood. The signage for the restaurant is clearly displayed but there is no sidewalk leading from the street. There is one designated parking stall available for people with disabilities at the end of the plaza where the site is located. The stall is sloped away from the building, making it difficult for a person using a wheelchair to independently transfer into their wheelchair from a vehicle without it rolling away. A curb ramp is provided from the parking stall but it is not level. It is on the corner of the sidewalk, and has multi-directional slopes along the route. Also, there is a pole at the corner of the sidewalk/parking stall, to prevent people from running over the curb ramp, however, it has been hit several times and now leans into the parking stall. Additionally, the pole creates somewhat of an obstruction for people to get onto the curb ramp. The ramp at the entrance is fine and the entrance door has adequate clear width but no automatic door opener.

The interior has both a smoking and non-smoking section, although the smoking section is not separately enclosed and ventilated. The counter is low and many of the food selections are clearly visible. The items for sandwiches and wraps cannot be seen by wheelchair users or people of short stature. Only tables and chairs are available as seating options. The chairs are moveable making it easier for wheelchair users and other customers. The menu is displayed overhead and is fairly well contrasted, although a menu at eye level is not available. The menu for sandwiches and wraps is in smaller print and the contrast is not as good, which makes it more difficult for people who have visual impairments. The restaurant is well illuminated. The music is at a level that is just audible, making conversation easy. A Braille menu is not available.

There are two (2) telephones available for public use, both equipped with volume control. However, the phones are located in the corridor to the washrooms and protrude more than the allowable 100 mm, making them a hazard for people who are blind or have a visual impairment, who may use a white cane or guide dog as a mobility aid.

Braille and tactile signage is not provided on the washroom doors. The manoeuvring space in the stall is large enough to accommodate someone using a wheelchair, although the grab bar is a little too far away, making it difficult and unsafe for people to use. The sink had levered faucets, and the pipes are recessed.

This restaurant may be usable by some customers with disabilities but improvements are required including level parking and a parking sign pole, the re-installation of the grab bars, as well as new signage for the doors and for the menu board. A safe pedestrian route can easily be added, and other impairments to full accessibility can easily be remedied.

CHAIN-C

Chain-C: Audit site-1

The clear width of the entrance doors of this chain's newer location is fine but the doors are a little difficult to manoeuvre through as the two doors are in close sequence, which the Ontario *Building Code* does not allow. The other entrance doors at the side are fine, but there are no automatic door openers.

There are two (2) entrances, but no sidewalk or safe pedestrian route leading to either of them, although there is little pedestrian traffic at this location, as it is located off a highway.

Accessible designated parking is provided and a curb ramp leads from the parking stall to the sidewalk.

The service counter is quite high and the seats are all fixed, making it more difficult for a customer who uses a wheelchair to position themselves out of the pedestrian route and to find a comfortable place to eat or drink. The illumination levels are adequate.

The washrooms do not have raised characters or Braille signage. The accessible stalls are equipped with grab bars and have adequate manoeuvring space. The faucets do not have lever handles and manoeuvring space is limited for people exiting the washroom while using a wheelchair.

No public telephone is available. This restaurant facility presents a variety of accessibility obstacles to individuals with disabilities. A person with a disability would

likely have difficulty accessing the premises as well as some of the services at this location.

Chain-C: Audit site-2

This site is accessed via an off-ramp from a highway. A curb ramp is provided leading to the entrance doors that are wide enough to meet clear width requirements but they are not equipped with an automatic door opener. There is a sidewalk running alongside the ramp but it ends at the top of the hill where one must then manoeuvre across the traffic in the parking lot. There is designated parking for people with disabilities but no vertical sign is provided. A vertical sign is required so that when the parking space is covered with snow, it is still understood that there is designated parking for people with disabilities.

Tables are provided with both fixed and moveable seating and the interior is well illuminated. The threshold at the entrance door is a little rough and it could be difficult for some wheelchair users to wheel over and it might cause someone, especially with a vision disability, to trip.

The menu is displayed overhead but not at eye level, which many people with low vision require, so that they can approach the sign to read it.

Washrooms are marked with a sign indicating they are accessible, although the first door does not meet clear width requirements of 810 mm. The washroom lacks tactile and Braille signage but an accessible stall is provided that has adequate manoeuvring space and grab bars. The sink is also fine.

This site has some accessibility features such as the moveable seating and the accessible stall, but it also has a door leading to the washrooms that fails to meet clear width requirements and the exterior lacks a safe pedestrian route to the restaurant.

Chain-C: Audit site-3

This site is located beside several other restaurant chains but there are no pedestrian sidewalks leading to any of the restaurants. The sign for this restaurant is well located. No designated parking is provided near the site.

The entrance doors meet the clear width requirements and are equipped with automatic door openers. The interior is well illuminated, free of protrusion hazards and provides a variety of seating options. A smoking room is available inside a glassed-in room at one end of the restaurant. The service counter is low and the signage is displayed overhead with the contrast and font style acceptable, although no menu is available at a low height to allow for reading by people with visual impairments. The amount owing is displayed on the cash register, which is useful for everyone but especially appreciated by people who are hearing impaired.

The washrooms have Braille and tactile signage to let people who are blind know which washroom to select, which is very good. The accessible stall has adequate manoeuvring space and is equipped with grab bars. The sink has lever handles, and the pipes under the sink have been insulated to protect wheelchair users from exposure to the hot pipes, which is very good. The men's washroom is smaller and had the sink immediately inside the door, which can be difficult if someone is at the sink as they block everyone from the route to the toilet stalls. The hand dryer is hazardous as it protrudes into the pedestrian route. No telephone is available for public use.

This restaurant has many accessibility features such as automatic door openers, Braille and tactile signage on the washrooms, accessible washrooms stalls and insulated pipes. Unfortunately, the washrooms have hand dryers that protrude into the route of travel.

Chain-C: Audit site-4

This site is located on a commercial street surrounded by residential neighbourhoods. This location was recently rebuilt in the late 1990's, replacing an older facility.

The signage for the restaurant is clearly displayed but there is no street number visible. There is no sidewalk leading from the street, and there is a lot of pedestrian and vehicular traffic into this location. There is parking at this location, but not a designated accessible spot. A curb ramp is provided from the parking lot, which would be fine, if it were not for the large flower planter that diminishes the clear width.

The entrance doors have adequate clear width but no automatic door openers. There are two doors, which are in extremely close sequence. The placement of the doors requires the customer hold open one door, while opening the other. The doors are quite heavy, and the exterior door has a threshold of approximately 50 mm, which is well beyond the maximum allowable of 13 mm.

The counter is low and the price is visible on the cash register. Only tables and chairs are available as seating options, and there is only one table with moveable chairs available, which does not provide choice to wheelchair users and poses a significant barrier if the table is occupied. The menu is displayed overhead and is mostly well contrasted. There is no menu for people to get close to, nor is there a Braille menu available. The restaurant is well illuminated. The music was at a level that was audible, but not loud. However, the restaurant is very small and the volume of customers makes the ambient noise level fairly loud.

There is one male and one female individual washroom. Braille and tactile signage is not provided on the washroom doors. The width of the doors into the washrooms is only 640 mm, well below the 810 mm required. The washroom is approximately 1400 mm x 1400 mm, however, the clear space is only approximately 700 mm x 700 mm once the fixtures are taken into account. Therefore, there is no access to washrooms for wheelchair users at this facility.

There is no telephone available for public use.

Despite being built after the current *Building Code* came into effect, this restaurant is not accessible to customers with disabilities. Access is difficult because of the door configuration and lack of automatic door openers, the lack of moveable chairs and the configuration of the tables, and because of the lack of Braille signage. Wheelchair users are required to sit in the pedestrian route, and the washrooms are not accessible at all. The restaurant would be frequently inaccessible to people with hearing impairments due to the noise levels.

CHAIN-D

Chain-D: Audit site-1

The entrance to the site of this older model of the chain's restaurants is at the back of the building near the parking lot. There is no sidewalk or safe pedestrian route leading to the entrance. A narrow sidewalk exists beside the building, however, it is obstructed by parked cars.

There is a high threshold (small ramp) at the entrance door, which makes it difficult for customers with disabilities. Accessible parking and a curb ramp are provided. The entrance door has adequate clear width but no automatic door opener is provided.

There is no counter service. Only table service is available. The tables are at an appropriate height and chairs can be moved, which is convenient for all customers, especially wheelchair users and those who may have service or guide dogs.

Washroom doors lack Braille and tactile signage and the clear width of the doors is too narrow at 760 mm to allow customers who use wheelchairs to enter. Manoeuvring space is also lacking beside the washroom doors. There is a larger stall provided but it only has a clear width of 760 mm and there is no transfer space provided beside the toilet. A grab bar is provided. The sink lacks a lever handle. A telephone equipped with a volume control is provided for public use.

The washroom is not accessible as it has very narrow doors. The ramp/threshold at the main entrance doors is not compliant with the Ontario *Building Code* and the lack of a sidewalk or safe pedestrian route is extremely dangerous for customers approaching on foot.

Chain-D: Audit site-2

This is a newer restaurant site. Signage is clearly visible from all approaches and is well contrasted. There is no sidewalk or safe pedestrian route leading to the entrance from the street, however, the street does not have sidewalks either.

Three accessible parking stalls and a curb ramp are provided at the main entrance, but there is no vertical sign, only the symbol painting on the ground. The vertical signs would indicate the existence and location of the accessible stalls when the ground is covered in snow. The entrance door has adequate clear width and has an automatic door opener, but the button is very small and difficult to find. When exiting the restaurant, the seats for people to wait are located within the 300 mm of space required to be kept clear beside the door. Once in the vestibule, the button for the automatic door opener is difficult to find as it is obscured by a plant. It is made even more difficult to access as the space in front of it is occupied by a large wooden box with pamphlets and take out menus, with a large plant on top.

There is no counter service at this restaurant, only table service. The clear route to the tables is diminished by the greeter's podium and is less than 810 mm wide, the podium and wall have been hit and scratched several times. The tables are at an appropriate height and chairs can be moved, which is convenient for many customers. The seating is either 2 benches with a fixed table, or a fixed table with a bench on one side and moveable chairs on the other. Lighting is provided at the booths and throughout the facility; however, the lighting is dim and casts shadows on the table and others at the table. There are many large windows and the amount of light at the nearby booths is easily controlled by blinds on the windows. The menus have good contrast. A Braille menu is available for the current menu. The music is fairly loud, which could make communication difficult for people who are hard of hearing. Conversations from adjoining tables, while not overly loud, were, nonetheless, a distraction and carried throughout the restaurant.

There is a very large hanging plant in the corridor outside the washrooms, which protrudes far beyond 100 mm and someone could easily walk into it, especially a customer with a visual impairment.

Washroom doors lack Braille or tactile signage, but have good clear width. The required manoeuvring space is also lacking beside the washroom doors, when one exits the washroom. There is a larger stall and the stall door is 810mm. There is the required space provided, however, there is a garbage can, which decreases the space beside the toilet, there is also a fold-up change table which encroaches on the required clear manoeuvring space. A grab bar is provided, and the toilet paper is well situated.

The sink and counter height is fine, however, the counter is heavily cluttered by flower displays, leaving little room on the counter to rest one's belongings. The pipes are not recessed, nor are they insulated. The lighting is quite dim in the washrooms. There is no telephone for public use provided.

This restaurant has many good features including the Braille menu and the accessible washroom design, but, unfortunately, the placement of plants reduce the clear width and block access to the automatic door opener button. A serious obstacle is the lack of space beside the greeter's podium. There are some obstacles to people with disabilities, which could easily be remedied.

Chain-D: Audit site-3

This is an older established site of this restaurant chain. Signage is clearly visible from all approaches and is well contrasted. There is a safe pedestrian route leading to the entrance from the street. The pedestrian route crosses the vehicular route, but has been raised, and a sign is posted indicating the pedestrian route, which is very good as drivers are warned to look out for pedestrians and customers are able to locate the safe route into the restaurant.

There are three accessible parking spaces, one at the front of the building and two at the rear. There is a curb ramp provided at the front parking space, which is posted with a vertical sign, and the symbol is painted on the ground. There is no curb ramp within close proximity to the accessible parking spaces at the rear of the building. Wheelchair users would have to remain in a narrow vehicular route and wheel to the front of the building to access the curb ramp at the front of the building. The entrance door is closer to the rear of the building than the front of the building. The entrance door has adequate clear width but does not have an automatic door opener. The threshold is greater than 13 mm and is quite uneven making it difficult for wheelchair users and creating a trip hazard for ambulatory customers.

There is no counter service at this restaurant, only table service. The seating is predominately two benches with a fixed table in a booth configuration. The table height is fine, but a wheelchair user is forced to sit in the aisle in the pedestrian route. Also, there is a table support immediately at the end of the table which prevents someone from getting close to the table to eat or drink. There are tables with moveable chairs, however, they are up three stairs and inaccessible to wheelchair users as there is no ramp or lift. Lighting is inadequate at the booths and throughout the facility, and much of the restaurant is dim and in virtual darkness. The menus have fairly good contrast, although in some areas there is a watermark beneath the writing making it somewhat more difficult to read. A recent Braille menu is available. The music volume was fine and not a distraction.

Washroom doors lack Braille or tactile signage. There are two doors in sequence leading into the washrooms, which only have a clear width of 740 mm. The required manoeuvring space is also lacking beside the washroom doors. There is a larger stall with a larger door; however, the door swings inward, making it impossible for a wheelchair user to close the door once inside the stall. One grab bar is provided, but a grab bar behind the toilet is missing. The toilet paper is well situated and does not interfere with the use of the grab bar. The sink cannot be accessed due to insufficient space between the counter and stall walls. The counter does not allow for any knee space.

There is an audible fire alarm visible, but not a visual alarm. There was a telephone with volume control for public use.

The washrooms are very poorly designed and seating for customers with disabilities is not available and illumination is very poor, but this restaurant has a Braille menu and has an extremely well designed pedestrian access route into the restaurant.

Chain-D: Audit site-4

This site is in a very busy commercial and tourist district. Signage is clearly visible and is well contrasted; however, no street number is indicated. There is sidewalk only access. No parking is associated with this facility. It would appear that this is an older restaurant, which has not been renovated.

The entrance door has adequate clear width but does not have an automatic door opener.

There is no counter service at this restaurant, only table service. The clear route to the tables and around the booths is fine. The tables are at an appropriate height and in some instances, chairs can be moved. The seating is predominately 2 benches with a fixed table, there are only a few locations where there is a bench on one side and moveable chairs on the other. However, the chairs are very heavy and difficult to move, and the tables wobble incessantly. Only one type of lighting is provided at the booths and throughout the facility, and it is very dim and less than 100 lux, which is required by the Canadian Standards Association (CSA) in cases where customers are required to read. The menus have good contrast and an appropriate font style. A Braille menu is not available.

The assessment could not be completed of the washrooms as they are downstairs and there was no lift or elevator access. There is also an additional restaurant seating area downstairs. There was no telephone for public use provided.

This restaurant is not accessible to customers with disabilities. It lacks basic access, as it has no automatic door opener, no access to the washrooms and seating options are very limited for people who use wheelchairs or guide dogs. Lighting is very dim making reading difficult for people with visual impairments.

CHAIN-E

Chain-E: Audit site-1

This site is an older facility. There is no safe pedestrian route provided to access the restaurant from the street. There is designated parking for use by people with disabilities, however there is no vertical sign indicating the space, only a symbol painted on the ground. The ramp leading from the parking area is fine.

The entrance doors have adequate clear width but no automatic door openers are provided. There is a threshold slightly greater than the allowable 13 mm but it is uneven

and bumpy due to deteriorating concrete. The interior offers both take-out and seating areas. The seating area is equipped with benches as well as chairs that can be moved, which is appreciated. Unfortunately, the bench seat at one of the booths is not properly secured and moves when sat on.

The interior at the take-out counter is well illuminated but has no low counter. Signage is provided only overhead. There was a staff podium in the middle of the pedestrian route to the seated area which limited the clear route to less than 810 mm.

The sit-down seating area is well illuminated with different types of lighting. The menu is displayed in black writing on yellow, which is easy to read, but some of the characters are printed in black writing on a red or blue background, which is very difficult to read. The dessert menu is well contrasted and has large pictures, which is helpful. Unfortunately, the music is quite loud.

There is a self-serve buffet which would be accessible to someone using a wheelchair. However, there are brochures on the sneeze guard advertising the specials which are too high to be read by someone using a wheelchair, and would not be accessible to people who are blind.

The door to the washroom has adequate manoeuvring space and a dedicated accessible washroom is provided. The door has a wheelchair logo but no tactile or Braille signage. The room is spacious and clear transfer space is provided beside the toilet, although the garbage bin is located in that space. Grab bars are provided and the sink is equipped with lever handles. The sink is recessed and has very well insulated pipes.

The copy of the bill presented to customers was easy to read, as was the amount displayed on the cash register. This site apparently has a Braille menu, but they, "would have to find it somewhere." A telephone is available for public use, but is not equipped with volume control.

This site has considered some access issues and has provided an accessible washroom, although, no accessible signage. The staff podium unnecessarily limits the clear route but some menu items are well presented. The counter is too high and the threshold at the main entrance needs to be repaired.

Chain-E: Audit site-2

This site is part of a collection of fast food restaurants located together on a busy commercial road. There is no safe pedestrian route from the street provided for customers to safely walk to the restaurant and no designated parking for use by people with disabilities. A ramp leading from the parking area is a very steep 1:8, making it extremely difficult to wheel up and inaccessible to most wheelchair users.
The entrance doors have adequate clear width but no automatic door opener is provided. The interior offers both take-out and seating areas with chairs that can be

moved which is appreciated by all customers. The interior at the take-out counter is well illuminated but has no low counter. Signage is provided only overhead and would be difficult for customers with visual impairments to read. The sit-down seating area is not very well illuminated.

The door to the washroom lacks adequate manoeuvring space, a dedicated accessible washroom is provided. The door has a wheelchair logo on it but no tactile or Braille signage. The room is spacious and transfer space is provided beside the toilet, although the garbage bin is located in that space. Grab bars are provided and the sink is equipped with lever handles. No telephone is available for public use.

No safe pedestrian route, a steep ramp and inadequate lighting are all reasons why customers with disabilities would not find this outlet accessible. Although, the washroom has been designed to be accessible, accessibility could be easily improved if the garbage bin is relocated.

Chain-E: Audit site-3

This is an older site along a busy commercial strip, in an established commercial and residential area. The sign is clearly visible but the street address is not posted.

There is no pedestrian route from the street provided for customers. There are two designated parking stalls for use by people with disabilities, one of them is wide, and the other is of regular size. Both have ground markings, but neither have a vertical sign to mark the spots when there is snow. There is a curb ramp leading from the parking area to the restaurant.

The entrance doors have adequate clear width but no automatic door opener is provided. The interior offers both take-out and seating areas with benches, as well as chairs that can be moved. The interior at the take-out counter is well illuminated but has no low counter. Signage is provided only overhead, and it is well contrasted. The sit-down seating area has a mix of illumination levels. The menu in the seated area is difficult to read as it is poorly contrasted with black on either a red or blue background. A Braille menu is available.

There is an individual accessible washroom. Unfortunately, the clear width of the door to the washroom is only 730 mm, and there is no levered handle on the door. The space in the washroom is quite large. The sink has knee space of 780 mm, and the top is at a height of 905 mm, which is fine. The faucets have levered handles and the pipes are recessed, and insulated. There are grab bars, however, the large toilet paper dispenser is located too close to one grab bar making it unusable.

A telephone is available for public use, but there is no volume control. The music is quite loud and harsh. There is a buffet counter used at lunch times which is accessible to wheelchair users. However, there are no labels or descriptions indicating what is being served at each bin.

The lack of a safe pedestrian route and automatic entrance doors, no lower counter, a narrow door at the washroom, and poor signage all contribute to the inaccessibility of this location.

Chain-E: Audit site-4

This site is part of a collection of fast food restaurants in a plaza. The surrounding area is a mix of residential and office complexes. There is a pedestrian route from the street provided for customers, however, one must still cross the vehicular route in the parking lot. The two designated parking stalls for use by people with disabilities are off to the side of the restaurant, and customers must also cross the same vehicular route. A curb ramp leading from the parking area and the sidewalk is old, crumbling and poorly constructed. There is a threshold at the curb ramp of 130 mm making it extremely difficult to wheel up, inaccessible to most wheelchair users, and a dangerous tripping hazard for others.

The entrance doors have adequate clear width but no automatic door opener is provided. There is a vestibule and another series of doors in close sequence and both sets of doors are quite heavy, making entrance into the restaurant quite difficult for everyone, but especially for customers with disabilities. The threshold exceeds 13 mm at both sets of doors, with the first threshold over 40 mm.

The interior offers both take out and seating areas with benches, as well as chairs that can be moved. The interior at the take-out counter is well illuminated but has no low counter. Signage is provided only overhead, and it is well contrasted. The sit-down seating area is not well illuminated. The menu in the seated area is difficult to read as it is poorly contrasted with black on either a red or blue background. A Braille menu is available.

There is a buffet counter used at lunch times, which is accessible to wheelchair users, but there are no labels or descriptions of what is being served at each bin.

The door to the washroom lacks adequate manoeuvring space. There is no accessible washroom provided. The washrooms are quite small, and contain only two small stalls. There is a sink, which is not accessible and has no knee space. The faucet is not levered, nor automatic.

A telephone is available for public use, but there is no volume control. There is a display case for children's toys that protrudes approximately 300 mm into the pedestrian route. It contains promotional items children may get when they purchase certain meals. It is in the pedestrian route on the route to the take-out counter, and the seated area of the restaurant. The music is quite loud and, as a result, patrons have to raise their voice to have a conversation.

This washroom is inaccessible to customers with disabilities, signage is poor, and the exterior has been poorly designed and maintained.

CHAIN-F

Chain-F: Audit site-1

This site is located in a newer strip mall. The chain's sign is displayed above the door. There is no sidewalk leading to the strip mall making it difficult for someone to safely reach the restaurant out of the traffic in the parking area. A curb ramp is located at the end of the sidewalk in front of the stores.

The entrance door has adequate clear width but there is no automatic door opener provided. No designated parking for people with disabilities is provided. There is a choice of seating available: some booths and some tables and chairs that can be moved which is appreciated by customers.

The interior space is well illuminated but music was playing which a person who is hard of hearing might find interferes with their ability to communicate in the restaurant.

The menu is displayed overhead in well-contrasted characters and a legible font. In addition, the menu is displayed on a vertical panel board which makes it easier for someone with a visual impairment to get close to read the menu. The amount owing is not displayed on the cash register, which is unusual, and no Braille menu was available for customers who are blind.

The counter is high but with a glass display case between the server and the customer. The server was very accommodating and cleaned the cutting knife for a customer who had allergies to dairy products.

The route to the washroom is difficult as display cases reduce the clear route. The washroom doors have signage that is indented making them legible tactually, although raised rather than indented characters are preferred. Only the women's washroom is marked as accessible as the men's washroom does not have an accessible stall. The door leading to the women's washroom lacks adequate manoeuvring space beside the door to allow someone using a wheelchair to manoeuvre through the door. Only one grab bar is provided (behind the toilet) and the grab bar on the sidewall is lacking. Unfortunately, the waste bin is located in the space beside the toilet. The room is large with plenty of manoeuvring space but the required clear spaces beside the toilet and behind the exit door are absent.

A poor attempt at creating an accessible restaurant has resulted in only the women's washroom being large and designated as accessible despite the lack of a grab bar and inadequate manoeuvring space. The only positive features worthy of note are the signage board which is available at eye level and the accommodating staff.

Chain-F: Audit site-2

This site is an older facility, in a shared building. There is no safe pedestrian route provided to access the restaurant from the street. There is designated parking for use by people with disabilities, however there is no vertical sign indicating the spot, only a symbol painted on the ground. A vertical sign is required, especially in winter when snowy conditions cover the ground. The curb ramp leads from the parking area and is painted with a contrasting yellow edge, although the pathway into the restaurant is not level, with many heaves and dips, which could constitute a tripping hazard.

The entrance doors have adequate clear width, but no automatic door openers are provided, and the garbage can is located in the pedestrian route at the exterior entrance door. The threshold is fine. The interior offers both take-out and seating areas. The seating area is equipped with only booths, equipped with benches. There are picnic tables outside located on a raised sidewalk, which is not accessible.

The interior at the take-out counter is well illuminated but has no low counter. Someone seated in a wheelchair would not be able to see the food, which is displayed behind glass, or make food selections based on sight. Signage is provided overhead and is well contrasted and there is also a menu sign board at the door, which provides an opportunity for someone with a visual impairment to read the menu choices.

The sit-down seating area is well illuminated with different types of lighting. The music was quite loud and there is a lot of peripheral ambient noise, from the food preparation and beverage dispensing area.

The bottled pop cooler and the fountain drink dispenser are self serve and the pop cooler is at a height which is well beyond the reach of someone using a wheelchair. The fountain drink dispenser and ice cube dispenser also are out of reach with operable controls above 1400 mm.

The door to the washroom has adequate manoeuvring space. A dedicated accessible washroom is provided, but it is also the women's washroom. The men's washroom is a very small individual washroom. The door to the women's washroom has a wheelchair logo but no tactile or Braille signage. The room is fairly spacious, although the transfer space provided beside the toilet is partially obstructed because of the sink. The garbage bin is moveable. An "L" shaped grab bar is provided, however, it has been installed incorrectly on an angle. The sink is equipped with lever handles. The sink basin is low and the pipes are not insulated.

The amount displayed on the cash register is easy to read and no telephone is available for public use.

This site has many features that make it inaccessible to customers with disabilities, including a noisy environment, dispensers and coolers well above the allowable

maximum reach range, the uneven pathway leading into the restaurant and an inaccessible washroom.

Chain-F: Audit site-3

This site is located in a store front along a commercial street in a downtown core. This is an older restaurant in an established area.

The signage for the restaurant is clearly displayed but there is no street number visible. There is only sidewalk access to this site. There is no parking directly affiliated with this location, but the city government has created a designated accessible space in the immediate area. There is a vertical sign which designates the space. A curb ramp is provided leading from the accessible spot to the sidewalk, however, as this is a parallel parking spot, it requires that cars park in front of the curb ramp. The closest secondary access to the sidewalk is at the intersection down the street, about 4-5 car lengths away.

From the sidewalk, there is a slight incline to the entrance door, with a slope of approximately 5-6 degrees. There is no level landing in front of the door, which is required by all building codes. The entrance door has adequate clear width but no automatic door opener. The threshold is slightly higher than the maximum allowable of 13 mm.

The counter is high and there is no low section. The price is visible on the cash register but it is difficult to see from a seated position. Only tables and fixed hard benches are available as seating options, and there are no tables with moveable chairs available. The menu is displayed overhead and some menu items are well contrasted. There is a vertical sandwich board with the menu available for people who wish to get close to read it. There is no Braille menu available. The restaurant illumination is very bright throughout and the music level is fine.

A very short person, or a person seated in a wheelchair, cannot see the food choices. There is a lot of glare on the bread display case as the illumination is extremely bright. The self-serve bottled beverages are in a full size vertical cooler. There are several selections available at various heights. The fountain pop dispenser is located with the operable parts above the maximum allowable of 1200 mm.

An assessment of the washroom facilities could not be completed, as they are downstairs. There is no lift or elevator available in order to provide customers access to the facilities. There is no telephone available for public use.

Accessibility for customers with disabilities has clearly not been identified as an issue of concern.

Chain-F: Audit site-4

This site was recently opened in an older building in a high traffic downtown location. There is no parking associated with this restaurant, as it is a storefront location. The sign for the restaurant is clearly visible, however, the street number is not located anywhere on the building.

Unfortunately, a more complete assessment could not be carried out, as there are two (2) steps at the entrance, and no alternative accessible entrance.

A telephone call was made to enquire whether a Braille menu is available, and one is not. However, the staff made assurances they would be able to help anyone unable to read the menu.

Clearly no consideration was given for customers with disabilities in the design or selection of this site.

CHAIN-G

Chain-G: Audit site-1

This older site is located on a busy downtown street. The chain's sign is clearly displayed over the door. Parking is not provided for this restaurant but on-street parking may be available.

A ramp leads from the sidewalk into the site, fortunately it is not steep and meets clear width requirements and the threshold is fine. Lighting is adequate at the entrance and the door width and manoeuvring spaces are fine at the entrance door.

The interior of the site is well illuminated and a variety of seating options are available. The clear routes are fine, except along the route to the washrooms where display cases have been stacked on the floor and reduce the clear route. Music is playing but is not very loud. The counter is low and the menu is displayed overhead. While the characters on the menu are well contrasted, there is no additional menu available at eye level. Unfortunately, one must pick up one's coffee at another counter, which is too high to be reached by someone who uses a wheelchair. The amount owing is clearly displayed on the cash. There are a variety of seating options available and chairs are moveable.

Two uni-sex accessible washrooms are provided and there is a raised symbol on the washroom door, which is very good. The washrooms are large and adequate manoeuvring space is provided beside the toilet, as required. There is no annoying large toilet paper dispenser provided but a regular dispenser, which is well located. Unfortunately the waste bin is located in this space. The sink has recessed pipes and the faucets are appropriate as they are usable by people with limited dexterity.

Chain-G: Audit site-2

This newer site is located in proximity to "big box" stores surrounded by newer residential neighbourhoods. The signage for the restaurant is clearly displayed, and the street number is located on a large sign for the plaza. The facility is one of three (3) independently housed restaurants in one building. The restaurant has a sidewalk leading from the street to the entrance, with a curb ramp at the sidewalk. There is one dedicated accessible parking stall, which is likely shared with the two (2) other restaurants housed in the same building. There is a symbol on the ground, but no vertical sign. There is a curb ramp from the parking; however, the flared edges are quite steep. A wheelchair user must go up the flared edge, as the level area at the top is not large enough to accommodate a turn due to the placement of a restaurant patio fence.

The entrance door has adequate clear width, and there is an automatic door opener, but it is difficult to find.

The counter is low and the snack selections are clearly visible. The menu is displayed directly overhead and the contrast is fine. However, the lettering is all in capitals and can be difficult to read. There is no menu available for people to get close to read it. The restaurant is well illuminated. The music is quite loud. Numerous seating options are available, including stuffed armchairs and hard backed chairs. The amount on the cash should have been visible, but is partially obstructed by a small box used for "coffee cards" of repeat customers.

Braille and tactile signage is provided on the washroom doors. The men's washroom has a pull door to enter, and the women's has a push door. Both doors are quite heavy and difficult to open. The space in the stall is large enough to accommodate someone using a wheelchair. The sink has levered faucets, and the pipes are recessed, but not insulated. There are grab bars, however, they are polished steel and are not non-slip. The toilet flusher is difficult to depress.

There is a self-serve condiment area with the cream, milk, sugar, napkins, *etc.*, which has two (2) levels, one of which is beyond the safe reach of wheelchair users. The area is quite small and it is unlikely a customer would have room to put personal items on it while preparing their beverage. Everything is within reach, but is randomly placed, depending on where the last customer left things.

Although improvements could be made, this site is well designed for people with disabilities. There are obstacles to independent use by people with disabilities, however, they are easily addressed and remedied.

Chain-G: Audit site-3

This newer site is located on a busy suburban street. The signage for the restaurant is clearly displayed, but there is no street number visible. The restaurant is partially

housed in a bookstore but can be partitioned from it to operate independently. There is one dedicated accessible parking stall, which is likely shared with the bookstore. There is a symbol on the ground, and a vertical sign posted on the facade of the building to the left of the stall. There is a curb ramp from the parking, however, it is not immediate to the parking stall and to access the ramp, one must proceed a short distance along the vehicular corridor.

The entrance door has adequate clear width, and there is an automatic door opener, but it is difficult to find.

The counter is low and the snack selections are clearly visible. The menu is displayed overhead and the contrast is not great. The lettering is all in capitals and can be difficult to read. The lighting on the overhead signage is dim, and caused glare making the signage even more difficult to read. There is no menu available for people to get close to read it. The restaurant is poorly illuminated overall and below 100 lux, even in reading areas. Numerous seating options are available, including stuffed armchairs, benches and hard backed chairs. The amount on the cash should have been visible, but is partially obstructed by a small box used for "coffee cards" of repeat customers.

There is a self-serve condiment area with the cream, milk, sugar, napkins, *etc.*, which was at 1000 mm. Everything is within reach, but is randomly placed, depending on where the last customer left things. Items are labelled, but not in Braille.

The washrooms are a shared facility with the bookstore, when the bookstore is closed and the restaurant is operating independently, there is no access to the washrooms, by anyone. Braille and tactile signage is not provided on the washroom doors. The space in the stall is large enough to accommodate someone using a wheelchair, is equipped with grab bars and has appropriate placement of the toilet paper dispenser. There are two sinks, both with sufficient knee space and levered faucets. One sink had pipes that were recessed; the pipes for neither sink are insulated.

There is no phone for public use.

This facility has been designed to accommodate the needs of customers with disabilities, and there are only minor improvements required to accomplish full accessibility.

Chain-G: Audit site-4

This site is located on the commercial street of an inner-city residential neighbourhood beside a mix of independent retail stores. The signage for the restaurant is clearly displayed, including the street number. The facility is located as a storefront, and has only sidewalk access. There is no parking for this location, designated or otherwise. The entrance door has adequate clear width but no automatic door opener. The threshold is over 20 mm.

The counter is low and the snack selections are clearly visible. The menu is displayed overhead and behind the service counter, and is not as well contrasted as it could be. The lettering is all in capitals, which can be difficult to read. Also, there is substantial glare from the lighting on the menu board, making if difficult to read without constantly changing positions. There is no menu available for people to get close, to read it. The restaurant is well illuminated. The music is at a level that is just audible, making conversation easy. Numerous moveable seating options are available, including stuffed armchairs, hard backed chairs and benches.

Braille and tactile signage are provided on the washroom doors. The space in the stall is large enough to accommodate someone using a wheelchair. The sink has levered faucets, and the pipes are recessed, but not insulated. At the time of the assessment, the women's washroom was out of service, so all customers were directed to the men's washroom.

There is a self-serve condiment area with the cream, milk, sugar, napkins, *etc.* Everything is within reach, but is randomly placed, depending on where the last customer left things. Items are labelled, but not in Braille.

Although very minor improvements could be made, customers with disabilities will not have difficulties accessing the goods and services of this facility.

APPENDIX III: Accessibility Checklist

RESTAURANT AUDIT INSTRUMENT OF SELECT ACCESSIBILITY INDICATORS

The Audit Instrument of Select Accessibility Indicators was developed Betty Dion Enterprises Ltd for the accessibility audit of select restaurant chains in Ontario undertaken for the Ontario Human Rights Commission. It can also be used directly by restaurants as an indicator to assist them in reviewing the accessibility of their facilities and services. The instrument is intended to provide a quick and limited test of compliance of selected items to the requirements in CAN/CSA B651-M95 – *Barrier Free Design Standard* and the Ontario *Building Code*. It was designed to be used easily and discreetly. All measurements are to be taken using metric measurements.

This is not a comprehensive accessibility checklist for evaluating the accessibility of an entire facility for all users with disabilities.

Signage

1. Is there an exterior sign identifying the name and address of the facility?		_____
2. Is the sign noticeable as you approach the facility?		
3. Are the characters on a contrasting background?		

Exterior Route (Exterior to Interior)

4. Is there a sidewalk leading from the street to the entrance?		_____
5. Is there a curb ramp at the sidewalk?		_____
6. Is there a level route from outside the exterior door to the interior of the building?		_____
7. If not, is there a ramp or lift to accommodate the change in elevation?		_____
8. What is the % of the slope of the ramp? (8.33% or lower is good, 10% or 11% is too steep - use a "smart tool")		_____
9. Is the width of the ramp 920 mm or greater?		
10. Is the threshold at the entrance less than 13 mm?		

Entrance Doors

11. Is the clear opening of the entrance door at least 810 mm? (measured from the door stop to the face of the open door)		_____

12. Does the main entrance door have an automatic door opener?		_____
13. Where an exterior door to a vestibule is automatic, is the interior door also equipped with an automatic door opener?		_____

Parking

14. Are there designated accessible parking spaces associated with the facility?		_____
15. Is the designated parking space 3900 mm or larger?		
16. Is the parking space level?		_____
17. Is there a vertical sign indicating that the parking space is for vehicles for persons with disabilities?		_____
18. Is there a curb ramp from the parking onto the sidewalk?		

Interior Route

19. Are there stairs leading to an area of the restaurant, where there is no ramp provided?		_____
20. Do all routes of travel meet the minimum 810 mm width requirement?		_____
21. Do all interior doorways meet the 810 mm clear opening (measured from door stop to face of door open at 90E)?		_____
22. Are all doors equipped with opening devices such as lever handles that are operable by one hand without requiring fine finger control?		_____
23. Do all doors have at least 600 mm of unobstructed wall space on the latch side of the doors that PULL open?		_____
24. Do all doors have at least 300 mm of unobstructed wall space on the latch side of the doors that PUSH open?		_____
25. At each point where the headroom is less than 1980 mm, is there a guardrail or barrier to prevent one from hitting ones head?		_____
26. Are there protrusions sticking out (more than 100 mm) into the pedestrian route that are at a height of 680 mm or higher?		_____
27. Is the flooring slip-resistant?		_____
28. Is the height of the counter less than 1000 mm?		_____
29. Is the amount owing displayed on the cash register?		_____
30. Is there a Braille Menu available?		_____
31. Is the menu displayed overhead?		_____
32. Is the menu also displayed where close reading can be done?		_____
33. Are the characters in a sans serif font, well contrasted and in large print? Overhead Other		_____

34. Are tables provided where wheelchairs users can sit? (height of 700-810 mm and a depth of 480 mm)? 35. Are there a variety of seating options available?		_____ _____
36. Can the chairs at the tables move?		_____

Washrooms

* EVALUATE BOTH MALE AND FEMALE WASHROOMS

37. Are there raised letters or a raised symbol on the washroom door?		_____
38. Do all doors have at least 600 mm of unobstructed wall space on the latch side of the doors that PULL open?		_____
39. Do all doors have at least 300 mm of unobstructed wall space on the latch side of the doors that PUSH open?		_____
40. Does the toilet stall door swing outwards?		
41. Is the clear opening for the toilet stall door at least 810 mm.		_____
42. Is there a grab bar beside the toilet?		
43. Is there at least 810 mm of clear floor space beside the toilet for a lateral transfer?		_____
44. Is the faucet operable with closed fist or automatically controlled? 45. What are the height, depth and width of the knee space at the sink?		_____ _____

Telephones

46. Is there a telephone available equipped with volume control for peopie with are hearing impaired?		_____

Other

47. Are there any other accessibility components of note or interest?		_____

APPENDIX IV: Restaurant Chain Commitments

FIVE STEPS TO ACCESSIBILITY	Country Style Food Services Inc.	McDonalds Restaurants of Canada Ltd	Pizza Hut (Yum Restaurants International)	Starbucks Coffee Canada Inc.	Subway Franchise Systems of Canada	Swiss Chalet (Cara Operations Ltd.)	Tim Hortons (TDL Group Corp.)
1. Develop accessibility policy & complaints procedure	Accessibility policy & complaints procedure being developed.	Accessibility policy in progress. Longstanding comprehensive complaints procedure in place.	Accessibility policy & complaints procedure in place.	Customer complaints procedure in place. Policy position is to comply with *Building Code* & *Americans with Disabilities Act*, & strive to satisfy *Human Rights Code*.	Policy & complaints procedure being developed.	Accessibility policy & complaints procedure will be developed.	Policy being developed. Customer complaints procedure in place.
2. Review & identify accessibility barriers	Committee, including membership from Health & Safety Committee, Store Operations, & Store Design, will identify existing barriers across corporate-owned & franchisee facilities based on *Building Code* & *Human*	Currently reviewing corporate restaurant accessibility survey tool & applying to broad representative sample of stores.	Both current & future assets are under review.	Different methods are already in place to identify accessibility issues. As such, do not intend to survey stores at this time.	Accessibility review in progress.	Currently assessing accessibility of varying standard floor plans.	Retained accessibility expert firm to review store layouts / designs & report on solutions. Will audit sample of existing stores & complete report by end of April 2004.

FIVE STEPS TO ACCESSIBILITY	Country Style Food Services Inc.	McDonalds Restaurants of Canada Ltd	Pizza Hut (Yum Restaurants International)	Starbucks Coffee Canada Inc.	Subway Franchise Systems of Canada	Swiss Chalet (Cara Operations Ltd.)	Tim Hortons (TDL Group Corp.)
	Rights Code.						
3. Develop standardized accessibility plan for future / rebuild locations[6]	Will review current store design specifications based on Building Code & Human Rights Code. Design will be mandated for all new locations to extent reasonably practicable, recognizing, in majority of cases, third party Landlords builds our stores.	Currently reviewing codes, standards & best practices as basis for minimum standards in standardized accessibility plan for new construction.	Currently following the Ontario *Building Code*. Developing standardized plan also based on current best practice standards.	Consistent store designs already incorporate detailed standards from *Americans with Disabilities Act* and Ontario *Building Code*.	Examining standardized plan & will attempt to ensure new locations will be in compliance with applicable law.	Developing new standardized accessibility plan for both corporate-owned and franchisee locations. Reviewing & amending franchise agreements to require all restaurants to meet standard accessibility plan.	Expert's report will inform development of standardized accessibility plan for future locations. Also developing plan (based on audit) for barrier removal when renovating existing stores (Approx. 60 Ont. locations per year).
4. For existing facilities, plan & begin removing barriers	Will bring to attention of franchisees barriers identified by accessibility review committee & request fixes that are easily addressed	Where possible, immediate steps will be taken to address easily resolved barriers. Renovate existing restaurants to	In progress.	Different methods are already in place to identify accessibility issues.	Planning for & beginning to remove existing barriers.	Annually renovates or replaces approx. 10% of direct-control locations, incorporating accessibility features.	Will take immediate steps to fix barriers that are easily addressed.

[6] Based on current *Building Code*, *Human Rights Code* and other best practices and standards including CSA Standard B651-M95 "Barrier Free Design" and CSA Standard B480-02 "Customer Service for People with Disabilities" (www.csa.ca)

FIVE STEPS TO ACCESSIBILITY	Country Style Food Services Inc.	McDonalds Restaurants of Canada Ltd	Pizza Hut (Yum Restaurants International)	Starbucks Coffee Canada Inc.	Subway Franchise Systems of Canada	Swiss Chalet (Cara Operations Ltd.)	Tim Hortons (TDL Group Corp.)
	and/or relatively inexpensive. Mandate more permanent solutions when lease & franchise contracts expire.	*Building Code* requirements.					
5. Monitor progress & report to OHRC in one year's time	Undertaking this commitment.	Accessibility plan will include objectives & timeframes. Will report to OHRC in one year.	Undertaking this commitment.	Starbucks states that: it has largely achieved accessibility; effective procedures are in place for addressing ad hoc issues; as such, no need for additional monitoring & reporting.	Undertaking this commitment.	Undertaking this commitment.	Undertaking this commitment.
Additional Comment	New store designs now incorporate accessibility features. Government codes and regulations should set out clear & precise accessibility requirements that are	Many stores have ramps, loose seating & automatic doors; designated parking; employees trained on assisting customers with disabilities. Supports		Employees receive training on serving customers with disabilities. Exploring the possibility of providing a Braille menu.		In process: ensuring availability of Braille menus at all full-service locations; ensuring all washroom doors have Braille & other tactile information;	Will utilize results of their audit of Ontario stores to help improve accessibility at other locations across Canada.

FIVE STEPS TO ACCESSIBILITY	Country Style Food Services Inc.	McDonalds Restaurants of Canada Ltd	Pizza Hut (Yum Restaurants International)	Starbucks Coffee Canada Inc.	Subway Franchise Systems of Canada	Swiss Chalet (Cara Operations Ltd.)	Tim Hortons (TDL Group Corp.)
	mandated as part of the approval process for securing building permits.	disability initiatives: Rick Hansen Man in Motion Tour 1986; Special Olympics since 1992; founding partner of National Access Awareness Week; Ronald McDonald's Children's Charities.				installing vertical signs for designated parking.	

APPENDIX V: Resources for Barrier-free Design

CANADA		
Ontario Human Rights Commission	Ontario *Human Rights Code* and the Ontario Human Rights Commission's *Policy and Guidelines on Disability and the Duty to Accommodate*	www.ohrc.on.ca
Ontario Ministry of Municipal Affairs and Housing	Ontario *Building Code*	www.obc.mah.gov.on.ca
Canadian Standards Association	CSA Standard B651-M95 "Barrier Free Design", and CSA Standard B480-02 "Customer Service for People with Disabilities"	www.csa.ca
Standards Council of Canada		www.scc.ca
Ontario March of Dimes	Ontario-based consulting services list providing assistance for employers and service providers on increasing accessibility	www.accessibilitydirectory.ca
Ontario Restaurant Hotel & Motel Association	Disability Sensitivity Awareness Training	www.orhma.com/training/course_outlines.asp
Betty Dion Enterprises Ltd publishes Universal Design	*Accessibility Audit of Select Restaurant Chains in Ontario* – Prepared for the Ontario Human Rights Commission. *International Best Practices Guide.*	www.bdel.ca/UDBPGuide.htm
OTHER JURISDICTIONS		
The Access Board (Federal Agency of the United States)	American Uniform Federal Accessibility Standards (UFAS) under the *Architectural Barriers Act* Americans with Disabilities Act Accessibility Guidelines (ADAAG)	www.access-board.gov/indexes/accessindex.htm
National Restaurant Association (United States)	Making Your Restaurant Accessible to Customers with Disabilities	www.restaurant.org/legal/law_ada.cfm
Australian Human Rights and Equal Opportunity Commission	Australian Advisory notes on Access to Premises	www.hreoc.gov.au/disability_rights/buildings/access_to_premises.html
Australian Building Codes Board	Draft Disability Standards for Access to Premises, Guidelines to the Premises Standard, and proposed revisions to the *Building Code of Australia*	www.abcb.gov.au/content/access/